

SECTION III—REMARKS

This amendment is submitted in response to the Office Action mailed April 22, 2005. Claims 25-27 are canceled and new claims 28-34 are added. Claims 28-34 remain pending in the application. Applicants respectfully request reconsideration of the application and allowance of all pending claims in view of the above amendments and the following remarks.

Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 25-27 as anticipated under 35 U.S.C. § 102(b) by one or both of German Patent No. DE-003537653AZ to Betz *et al.* (“Betz”) and Japanese Patent Application No. JP-362229884A to Takesawa *et al.* (“Takesawa”).

As to claims 25-27, Applicants respectfully submit that the Examiner’s rejections are rendered moot by the cancellation of the claims.

As to new claims 28-34, Applicants respectfully traverse the Examiner’s rejections. A claim is anticipated only if each and every element, as set forth in the claim, is found in a single prior-art reference. MPEP § 2131; *Verdegaal Bros. v. Union Oil of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). As explained below, Betz and Takesawa cannot anticipate these claims because they do not disclose every element and limitation recited therein.

Claim 28 recites a process combination including providing a housing having two or more solder pins projecting therefrom, positioning a frame on the housing such that the solder pins are received in a corresponding number of holes in the

frame, “aligning the frame by moving it parallel and perpendicular to the solder pins, wherein the holes are sized relative to the solder pins such that the frame can be moved a selected distance perpendicular to the solder pins without the solder pins contacting the holes” and “soldering the solder pins within the holes.” Neither Betz nor Takesawa discloses a combination including these limitations.

Betz discloses a printed circuit board PL with sheet metal frames R1 and R2 attached to each side. Sheet metal frames R1 and R2 each include several solder pins which are inserted in holes in the circuit board such that the solder pins of one frame are inserted offset from those of the other frame. As disclosed in the abstract, solder penetrates through holes that are unoccupied by solder pins, so that the sheet metal frames are soldered to metallization on the printed circuit board. The ends of some solder pins are bent to hold the frame on the circuit board. Betz does not disclose that the solder pins can move within the circuit board holes, and therefore cannot disclose, teach or suggest a method combination including “aligning the frame by moving it parallel and perpendicular to the solder pins, wherein the holes are sized relative to the solder pins such that the frame can be moved a selected distance perpendicular to the solder pins without the solder pins contacting the holes.” Moreover, Betz does not disclose that the solder pins are soldered within the holes; instead it discloses that solder is placed in holes that are unoccupied by pins. Betz therefore cannot disclose, teach or suggest a method combination including “soldering the solder pins within the holes.”

Takesawa discloses a photoelectric apparatus in which a package 43 is attached to a circuit board 5 using pins 46. The pins 46 are inserted through the circuit board and connected to grounding circuits by applying solder 3a and 8a on the opposite side of the printed circuit board. Takesawa does not disclose that the pins 46 can move within the holes in the circuit board and thus it cannot disclose, teach or suggest a method combination including “aligning the frame by moving it parallel and perpendicular to the solder pins, wherein the holes are sized relative to the solder pins such that the frame can be moved a selected distance perpendicular to the solder pins without the solder pins contacting the holes.” Takesawa also does not disclose that any solder is applied inside the holes in the printed circuit board, and therefore it cannot disclose, teach or suggest a method combination including “soldering the solder pins within the holes.” For these reasons, Applicants submit that neither Betz nor Takesawa can anticipate claim 28 and respectfully request allowance of the claim.

Regarding claims 29-34 if an independent claim is allowable, then any claim depending therefrom is also allowable. *See generally* MPEP § 2143.03; *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988). As discussed above, claim 28 is in condition for allowance. Applicants respectfully submit that claims 29-34 are therefore allowable by virtue of their dependence on an allowable independent claim, as well as by virtue of the features recited therein. Applicants therefore respectfully request withdrawal of the rejections and allowance of these claims.

Conclusion

Given the above amendments and accompanying remarks, all claims pending in the application are in condition for allowance. If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to allowance of the claims, the Examiner is requested to specifically point out where such teaching may be found. Further, if there are any informalities or questions that can be addressed via telephone, the Examiner is encouraged to contact the undersigned attorney at (206) 292-8600.

Charge Deposit Account

Please charge our Deposit Account No. 02-2666 for any additional fee(s) that may be due in this matter, and please credit the same deposit account for any overpayment.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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Todd M. Becker
Attorney for Applicant(s)
Registration No. 43,487

Blakely, Sokoloff, Taylor & Zafman LLP
12400 Wilshire Boulevard, Seventh Floor
Los Angeles CA 90025-1030
Phone: 206-292-8600
Facsimile: 206-292-8606

Enclosures: Postcard
Amendment transmittal, in duplicate